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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

SANDRA ZIRKEL and RALPH  
CEDANO, Individually and, on Behalf of  
All Other Persons Similarly Situated,

Case No. 3:10-CV-237 HZ

Plaintiffs,

DECLARATION OF YOONA PARK IN  
SUPPORT OF PLAINTIFFS' MOTION  
TO COMPEL DISCOVERY

v.

THRIFTY PAYLESS, INC. d/b/a RITE  
AID and RITE AID CORPORATION,

Defendants.

I, Yoona Park, declare under penalty of perjury as follows:

1. I am an associate at the law firm of Stoll Stoll Berne Lokting & Shlachter P.C.,

counsel for the plaintiffs in this case.

{SSBLS Main Documents\8032\001\00289163-1 }

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COMPEL DISCOVERY

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2. I have personal knowledge of the facts and matters stated herein, which facts and matters are to the best of my knowledge and belief true and correct.

3. Attached as Exhibit 1 is a true and correct copy of Defendants' Response to Plaintiffs' First Set of Interrogatories to Defendants, dated September 28, 2010.

4. Attached as Exhibit 2 is a true and correct copy of Defendants' Response to Plaintiffs' First Request for Production of Documents, dated September 28, 2010.

5. Attached as Exhibit 3 is a true and correct copy of the opinion issued in *Jimenez, et al. v. Domino's Pizza, LLC*, 2006 U.S. Dist. LEXIS 66510 (C.D. Cal. 2006), decided on January 11, 2006.

6. Attached as Exhibit 4 is a true and correct copy of the opinion issued in *Whitehorn v. Wolfgang's Steakhouse, Inc.*, 2010 U.S. Dist. LEXIS 58460 (S.D.N.Y. 2010), decided on June 14, 2010.

7. Attached as Exhibit 5 is a true and correct copy of the opinion issued in *Sedtal v. Genuine Parts Co.*, 2009 U.S. Dist. LEXIS 63261 (E.D. Tex. 2009), decided on July 23, 2009.

8. Attached as Exhibit 6 is a true and correct copy of the opinion issued in *Morden v. T-Mobile USA, Inc.*, 2006 U.S. Dist. LEXIS 42047 (W.D. Wash. 2006), decided on June 22, 2006.

9. Attached as Exhibit 7 is a true and correct copy of the opinion issued in *Fei v. WestLB AG*, 2008 U.S. Dist. LEXIS 33310 (S.D.N.Y. 2008), decided on April 23, 2008.

10. Attached as Exhibit 8 is a true and correct copy of the opinion issued in *Flores v. Osaka Health SPA, Inc.*, 2006 U.S. Dist. LEXIS 11378 (S.D.N.Y. 2006), decided on March 16, 2006.

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I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED this 7th day of March, 2011.

/s/ Yoona Park  
Yoona Park

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